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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HILLCREST INVESTMENTS, LTD., a  
Canadian Corporation; AMERGOSA  
ENTERPRISE, LLC.,

Plaintiffs,

vs.

AMERICAN BORATE COMPANY, a foreign  
corporation; AMERICAN BORATE  
COMPANY of Texas, a foreign corporation;  
STATE ENGINEER, STATE OF NEVADA;  
DEPARTMENT OF CONSERVATION AND  
NATURAL RESOURCES, DIVISION OF  
WATER RESOURCES, a Nevada Political  
Subdivision; RAMM CORPORATION, a  
Nevada Corporation; UNITED STATES FISH  
AND WILD SERVICE, a division of the  
UNITED STATES; NATIONAL PARK  
SERVICE, a division of the UNITED  
STATES; DOES I – V; and ROES VI – X,

Defendants.

Case No. 2:21-cv-00964-RFB-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO  
DEFENDANTS' AMERICAN BORATE  
COMPANY AND AMERICAN BORATE  
COMPANY OF TEXAS' RENEWED  
MOTION FOR SANCTIONS  
(ELEVENTH REQUEST)**

Plaintiffs, HILLCREST INVESTMENTS, LTD. and AMERGOSA ENTERPRISE, LLC  
("Plaintiffs"), Defendants, AMERICAN BORATE COMPANY AND AMERICAN BORATE  
COMPANY OF TEXAS (collectively "American Borate") and non-party attorney BYRON  
THOMAS, ESQ., ("Thomas") hereby stipulate and agree as follows:

On June 28, 2022, American Borate filed a renewed motion for sanctions against Plaintiffs  
and Thomas. Based on the filing of a previous stipulation, Plaintiffs' and Thomas' response is due  
November 18, 2022. Hillcrest and American Borate have diligently been negotiating settlement.

American Borate needs additional time to consider the Plaintiffs' and Thomas' latest offer. As a result, the parties agree to extend Plaintiffs' and Thomas' response deadline to December 9, 2022.

The parties do not seek this extension to cause delay or prejudice any party.

Dated this 18th day of November, 2022.

**HANKS LAW GROUP**

**LEONARD LAW, PC**

/s/ Karen L. Hanks

/s/ Debbie Leonard

Karen L. Hanks, Esq.

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**LAW OFFICES OF BYRON THOMAS**

/s/ Byron Thomas

Byron Thomas, Esq.

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3275 S. Jones Blvd. Ste 104

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*Attorney for Amergosa Enterprise, LLC and  
On behalf of himself individually*

**IT IS SO ORDERED.**



**RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE**

DATED this 21st day of November, 2022.